UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA TERRE HAUTE DIVISION

| LADONNA N. FLORES, |) |
|---------------------------------------|--------------------------------|
| Plaintiff |)) |
| VS. |) CASE NO. 2:14-CV-176-WTL-WGH |
| HALTER VEGETATION MANAGEMENT, INC. |))) |
| Defendant |) |
| | |

AGREED JUDGMENT

Comes now the Plaintiff, LaDonna N. Flores ("Flores"), by counsel, and comes now the Defendant, Halter Vegetation Management, Inc. ("Halter"), by counsel, and hereby stipulate and agree to the entry of judgment in this case in favor of Flores and against Halter under the following terms:

- 1. Judgment is hereby entered in Flores' favor and against Halter in the total sum of Twenty-Three Thousand Dollars (\$23,000.00). Of this Twenty-Three Thousand Dollar (\$23,000.00) amount, the sum of Fifteen Thousand Five Hundred Dollars (\$15,500.00) represents an award of damages to Flores and the sum of Seven Thousand Five Hundred Dollars (\$7,500.00) represents Halter's payment of statutory attorney's fees, costs and expenses owed to a prevailing plaintiff under the Fair Labor Standards Act and the Indiana Wage Claims Statute.
- This Agreed Judgment is submitted to the Court in accordance with the parties'
 March 5, 2015 settlement agreement reached at a court-sponsored settlement

conference.

- 3. Consistent with the parties' March 5, 2015 agreement, so long as Halter makes all agreed upon payments toward the judgment on or before the agreed upon dates, no interest shall accrue on this judgment and Flores shall take no additional steps to enforce this judgment against Halter.
- 4. Consistent with the parties' March 5, 2015 agreement, so long as Halter makes all agreed upon payments toward the judgment on or before the agreed upon dates, Halter's payment of Flores' attorney's fees shall be discounted from Seven Thousand Five Hundred Dollars (\$7,500.00) to Two Thousand Five Hundred Dollars (\$2,500.00) and Halter shall be deemed to have fully satisfied the entire judgment. If Halter fails to make any of the agreed upon payments, the full amount of the judgment, including the full attorney fee award, shall be enforced against Halter.
- 5. Consistent with the parties' March 5, 2015 agreement, so long as Halter makes all agreed upon payments toward the judgment on or before the agreed upon dates, Flores shall file a notice with the Court advising that the entire judgment has been satisfied.
- 6. This Agreed Judgment resolves all of Flores' outstanding claims against Halter and represents full satisfaction of all claims Flores has or may have against Halter related to her former employment with Halter.
- 7. If Halter fails to timely make any payment described in the parties' March 5, 2015 agreement, the unpaid balance of the original Twenty-Three Thousand Dollar

(\$23,000.00) judgment shall be subject to enforcement by Flores and interest at the federal judgment interest rate shall begin to accrue from the date of any failure to timely make said payment.

Hunt, Hassler, Lorenz & Kondras LLP Morrie Doll & Associates LLC /s/Robert P. Kondras, Jr. \s\Maurice E. Doll Robert P. Kondras, Jr. Maurice E. Doll Attorney No. 18038-84 Attorney No. 4554-42 ATTORNEYS FOR PLAINTIFF, ATTORNEY FOR DEFENDANT, Halter Vegetation Management, Inc. Thomas Thacker 100 Cherry Street P.O. Box 703 Terre Haute, Indiana 47808 Newburgh, IN 47629 (812) 232-9691 (812) 858-5204 kondras@huntlawfirm.net morriedoll@hotmail.com APPROVED THIS 30th DAY OF March , 2015 AND ENTERED AS THE

FINAL JUDGMENT IN THIS CAUSE OF ACTION.

Hon. William T. Lawrence, Judge United States District Court Southern District of Indiana